

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

CONOPCO, INC. d/b/a/ UNILEVER,

*Plaintiff,*

v.

2026 THIRD REALTY, LLC, HAE HEE  
KIM, COURTNEY HAEJIN KIM, DANIEL  
KIM, BRYANT KIM, K & K FOOTWEAR,  
INC., AND JOHN DOES 1-10, inclusive,

*Defendants.*

Case No. 22-cv-3480-AT

**SUPPLEMENTAL DECLARATION OF STEPHEN  
G. WARD IN SUPPORT OF CONOPCO, INC.  
D/B/A UNILEVER'S EMERGENCY MOTION FOR  
MODIFICATION OF *EX PARTE* TEMPORARY  
RESTRAINING ORDER; ASSET RESTRAINING  
ORDER AUTHORIZING; *EX PARTE* SEIZURE;  
ORDER TO SHOW CAUSE FOR PRELIMINARY  
INJUNCTION; AND ORDER ALLOWING  
EXPEDITED DISCOVERY**

**FILED UNDER SEAL**

I, STEPHEN G. WARD, declare as follows:

1. I am a private investigator licensed in New York, and the CEO of Polaris Corporate Risk Management, LLC. I am over the age of 18 and am competent to make this declaration which is based upon my personal knowledge of the facts stated herein. If called as a witness, I could and would testify to the statements made herein. I make this declaration in support of Plaintiff Conopco, Inc. d/b/a Unilever's ("Unilever")'s emergency motion for modification of the *Ex Parte* Temporary Restraining Order; Asset Restraining Order; Order Authorizing *Ex Parte* Seizure; Order to Show Cause for Preliminary Injunction; and Order Allowing Expedited Discovery ("Amended TRO").

2. On April 27, 2022, I submitted a declaration in support of Unilever's Application for an *Ex Parte* Temporary Restraining Order; Order Authorizing *Ex Parte* Seizure; Order to Show Cause for Preliminary Injunction; and Order Allowing Expedited Discovery ("Original TRO Application").

3. On April 29, 2022, the Court granted the Original TRO Application and issued an *Ex Parte* Temporary Restraining Order; Order Authorizing *Ex Parte* Seizure; Order to Show Cause for Preliminary Injunction; and Order Allowing Expedited Discovery (“Original TRO”).

4. On May 3, 2022, with the assistance of the New York Police Department (“NYPD”), I executed the seizure order included in the Original TRO at two locations: (1) 2026 3<sup>rd</sup> Avenue, New York, 10029 (the “First Location”), and (2) 1992 3<sup>rd</sup> Avenue, New York, NY 10029 (“Second Location”). Also on May 3, 2022, with the assistance of the Haworth, New Jersey Police Department, a team from Polaris executed the seizure order included in the Original TRO at 152 Delaware Ave., Haworth, New Jersey 07641 (“Third Location”).

5. While in the process of executing the seizure order included in the Original TRO at the First Location, an unidentified Black male (“Individual 1”) approached me and asked me what we were looking for. I advised Individual 1 that we were gaining entry to search the First Location for pallets of Hellmann’s-branded mayonnaise. Individual 1 advised that he knew about the mayonnaise because it was his company that bought the mayonnaise.

6. Individual 1 subsequently led me inside the AMIS DISCOUNTED FURNITURE LLC (“AMIS Furniture”) storefront located at 2020 Third Avenue, New York, New York 10035 (“AMIS Location 1”). Upon entering AMIS Location 1, Individual 1 logged into a computer and showed me screens of a Unilever website and claimed that he had purchased the goods from Unilever. With the permission of Individual 1, I took photographs of the said screens. Individual 1 advised that the mayonnaise was shipped to Gambia, Africa, approximately two weeks ago.

7. Individual 1 provided the name Seedy Sannah, who is allegedly the individual taking custody of the shipped Hellmann’s mayonnaise from Individual 1. I was also advised by

Individual 1 that he shipped 17,280 units of Hellmann's mayonnaise, equivalent to roughly 24 pallets.

8. Also outside of the First Location, an unidentified Hispanic male ("Individual 2") approached me and advised that the mayonnaise in question was expired and that for several weeks, the owners of AMIS Furniture had a crew of three people working around the clock to affix fake labels on the expired mayonnaise. Individual 2 stated that the mayonnaise was removed from the Location on May 2, 2022.

9. I gained entry to the First Location and found, among other things, garbage bags filled with removed Hellmann's mayonnaise labels.

10. Inside the First Location, we also found several boxes that appear to be from Vibrant Printing and Graphic located at 4015 White Plains Road, Bronx, New York 10466 ("Vibrant Printing").

11. I was advised by the First Location's superintendent that AMIS Furniture has been using the storefront at the First Location as a storage unit, but he was not aware if the owners of the building located at the First Location were involved with AMIS Furniture.

12. After the May 3, 2022 seizures, I reviewed and analyzed some of the initial documents and things that were seized from the First, Second, and Third Locations.

13. While searching the First Location, we discovered bank statements and checks from the following institutions:

- Bank of America (AMIS Discounted Furniture LLC, Account No. 00135 021000322 4830780055948)
- Citibank (AMIS Discounted Furniture LLC, Account No. 021000089 6863941479 1004)
- TD Bank (AMIS Discounted Furniture LLC, Account No. 434-0186819; Customer Reference No, 4340186819-713-T-####)

- Chase (Card #\_5917; AID# A0000000980840)

14. The identities of two individuals, Youssouf Diagouraga and Mustufa Ganchi, were discovered during the seizures at the First and Second Locations.

15. Documents seized at the First and Third Locations demonstrate that Mr. Diagouraga is affiliated with AMIS Furniture and has leased property from certain of the Kim Defendants.

16. The initial investigations also indicate that Mr. Ganchi is connected with Vibrant Printing, located at 4015 White Plains Road, Bronx, New York 10466 (the Defendant who appears to be printing fake labels).

17. Although investigations remain preliminary, it appears that AMIS Furniture, Mr. Diagouraga, and/or an affiliated entity or individual purchased HELLMANN'S mayonnaise on a "close out" sale (i.e., sale of products close to expiration date at a discount) in at least around February 2022 (or earlier).

18. It appears that after AMIS Furniture, Mr. Diagouraga, and/or an affiliated entity or individual procures expired Hellmann's products, they work with Mr. Ganchi and Vibrant Printing to make counterfeit labels. After the expired products were relabeled, it appears that some of the counterfeit products were moved from the First Location on May 2, 2022 to Port Newark to be shipped via container vessel to Gambia.

19. Documents obtained at the First and Third Locations reveal that AMIS Furniture is affiliated with numerous storefronts close to the First Location, including (1) 2020 3rd Avenue, New York, New York 10029; (2) 2022 3rd Avenue, New York, New York 10029; and (3) 2236 3rd Avenue, New York, New York 10029.

20. Based on the discrepancies in the stories provided by Individual 1 and Individual 2 at the First Location, as well as the absence of Counterfeit Products at the First Location (although it had been confirmed via social media and Unilever that they were previously stored there), it is likely that Counterfeit Products and counterfeit labels are located at the following locations:

- 2020 3rd Avenue, New York, New York 10029;
- 2022 3rd Avenue, New York, New York 10029;
- 2236 3rd Avenue, New York, New York 10029;
- 4015 White Plains Road, Bronx, New York 10466; and
- Port of Newark, 241 Calcutta Street, Newark, New Jersey 07114.

I declare under penalty of perjury under the laws of the United States of America the foregoing is true and correct.

Executed on May 4, 2022 in New York, New York.

/s/ Stephen G. Ward  
Stephen G. Ward

